

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Jamie Ann-Irwin Oulton)	
)	
)	Case No. <u>10-30774-KRH</u>
)	
)	
)	Chapter <u>13</u>
Debtor(s) Address)	
2900 Greenway Ave)	
Henrico, VA 23228)	
)	
Last four digits of Social Security No(s): <u>6256</u>)	
)	
)	

NOTICE OF MOTION

Jamie Ann-Irwin Oulton has filed papers with the court to Sell Real Property.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before 2/8/2013, you or your attorney must:

X File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

Debt Law Group of America Law Group, Inc.
2800 N Parham Rd, Suite 100
Henrico, VA 23294

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☐ Attend the hearing on the motion (or objection) scheduled to be held on _____ at _____ . m. at
United States Bankruptcy Court, 701 East Broad Street, Ctrm
<5100/5000> Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 1/18/2013

Signature, name, address, and telephone
number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

Debt Law Group of America Law Group Inc
2800 N Parham Rd Ste 100

Henrico, VA 23294

Virginia State Bar No. 29640

Counsel for Jamie Ann-Irwin Oulton

Certificate of Service

I hereby certify that I have this 18th day of January, 2013, electronically sent, mailed, or hand-delivered a true copy of the foregoing Notice of Motion to all necessary parties.

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Jamie Ann-Irwin Oulton

Debtor

Case No.: 10-30774-KRH
Chapter 13

**MOTION FOR THE DEBTOR
TO SELL REAL PROPERTY**

Comes now the Debtor, by counsel, and as for his Motion to Sell Real Property states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on 2/6/2010.
2. Chase is the secured creditor of the Debtor that holds a first mortgage in the approximate principal amount of \$252,417.47 on the Debtor's real property located at 3445 Cedar Plains Road Sandy Hook, VA 23153.
3. The Debtor, who jointly owns this property with her husband, has entered into a purchase agreement dated 11/24/2012 for the purchase price of \$238,000.00.
4. The proceeds of the sale of the property will be used to satisfy via short sale the first mortgage with Chase, approximately \$225,726.74; to satisfy via short sale the second mortgage with Bank of Essex; to pay related administrative closing/settlement costs, approximately \$8,773.26; and to pay Richard James Oulton, debtor's attorney, a reasonable and necessary attorney fee for services rendered in this matter not to exceed \$500.00. There will be no money remaining to pay to Robert Hyman, Chapter 13 Trustee. The Debtor will

remain in her current bankruptcy and continue making regular monthly payments.

Wherefore, the Debtor, Jamie Ann-Irwin Oulton, requests that the Court enter an Order authorizing the sell of real property in accordance with the terms of his agreement with Kevin and Emily Brooks and that the debtor be granted such motion.

DATED, 1/18/2013.

JAMIE ANN-IRWIN OULTON

By /s/Richard James Oulton
Of Counsel

Richard James Oulton, Esquire
VSB# 29640
Debt Law Group of America Law Group, Inc.
2800 N Parham Rd
Suite 100
Richmond, VA 23294
(804) 308-0051

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by electronic means or mailed, by first class mail, a true and accurate copy of the foregoing Motion for Proposed Sale of Real Property was sent to the U.S. Trustee, Richmond, VA 23220 and Robert Hyman, Chapter 13 Trustee, P.O. Box 1780 Richmond, VA 23219-1780 and all creditors and necessary parties on this 1/18/2013.

/s/Richard James Oulton
Richard James Oulton

Creditors

American Infosource Lp As Agent for
World Financial Network National Bank As
Abercrombie & Fitch
PO Box 248872
Oklahoma City, OK 73124-8872

American Infosource Lp As Agent for
World Financial Network National Bank As
Victoria's Secret
PO Box 248872
Oklahoma City, OK 73124-8872

Aurora Loan Services I
10350 Park Meadows Dr St
Littleton, CO 80124-0000

AURORA LOAN SERVICES, LLC
6666 EAST 75TH STREET
INDIANAPOLIS IN 46250

Bank Of America
Po Box 1598
Norfolk, VA 23501-0000

Bk Essex
Prince St
Tappahannock, VA 22560-0000

Capital One Auto Finan
3901 Dallas Pkwy
Plano, TX 75093-0000

Capital One Auto Finance
P.O. Box 201347
Arlington, TX 76006

Capital One Auto Finance, c/o Ascension Capital Gr
P.O. Box 201347
Arlington, TX 76006

Chase
10790 Rancho Bernardo Rd
San Diego, CA 92127-0000

CHASE HOME FINANCE, LLC
3415 VISION DRIVE
COLUMBUS OH 43219

County of Goochland Treas
1800 Sandy Hook Road
Goochland, VA 23063

CR Evergreen, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

Directv c/o The CBE Group Inc
131 Tower Park Dr
Suite 100
Waterloo, IA 50701-0000

East Bay Funding, LLC
c/o Resurgent Capital Services
PO Box 288
Greenville, SC 29603

Encore Receivable Management
400 N Rogers Rd
PO Box 3330
Olathe, KS 66063-3330

GE Consumer Finance
For GE Money Bank
dba CARECREDIT/GEMB
PO Box 960061
Orlando FL 32896-0661

GE Money
PO Box 981127
El Paso, TX 79998-1127

Gemb/Care Credit
Po Box 981439
El Paso, TX 79998-0000

Goochland County Treasurer
1800 Sandy Hook Rd
Goochland, VA 23063

Henrico Doctors Hospital
c/o NCO Financial Systems, Inc.
1804 Washington Blvd.
Dept. 600
Baltimore, MD 21230

Henrico Doctors Hospital--Frst
PO Box 99400
Louisville, KY 40269-0000

Hfc
Po Box 3425
Buffalo, NY 14240-0000

HFC
PO Box 5608
Glendale Heights, IL 60139-5608

Jareds Jewelers
375 Ghent Rd
Akron, OH 44333-0000

John Oulton
2900 Greenway Ave.
Henrico, VA 23228

JPMorgan Chase Bank, N.A.

Chase Records Center
Mail Code LA4-5555 - 700 Kansas Lane
Monroe, LA 71203

Law Offices - Shapiro & Burson
236 Clearfield Ave
Suite 215
Virginia Beach, VA 23462-0000

Nationstar Mortgage, LLC
Bankruptcy Department
350 Highland Dr.
Lewisville, Texas 75067

Nationwide Recovery Se
Po Box 1015
Cleveland, TN 37364-0000

Nco Fin/51
Po Box 13574
Philadelphia, PA 19101-0000

Portfolio Recovery Associates
PO BOX 41067
Norfolk VA 23451

PRA Receivables Management, LLC
As Agent of Portfolio Recovery Assocs.
PO Box 41067
Norfolk, VA 23541

Sheridan
PO Box 452409
Fort Lauderdale, FL 33345-2409

Sheridan Children's Hlthcr-VA
PO Box 452409
Fort Lauderdale, FL 33345-2409

Sterling Inc. dba Jared Galleria of Jewelry
c/o Weltman, Weinberg & Reis, Co., LPA
965 Keynote Circle
Brooklyn Hts, OH 44131

Tanya Proffitt
Dept TREA
2900 Greenway Ave
Henrico, VA 23228

Verizon
PO BOX 3037
Bloomington, IL 61702-3037

Verizon Virginia Inc
500 Technology Dr
Weldon Spring, MO 63304-0000

Wfnb/Abrecrombie Fitch
Po Box 182548
Columbus, OH 43213-0000

Wfnnb/Victorias Secret
Po Box 182128
Columbus, OH 43218-0000

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In Re: Jamie Ann-Irwin Oulton

Case No. 10-30774-KRH
Chapter 13

Debtor

Corrected Proposed
ORDER AUTHORIZING SALE
OF REAL PROPERTY

This matter came to be heard upon the Motion of the Debtor for the authority to sell real property, and it appearing to the Court that the debtor has the opportunity to sell the real property located at 3445 Cedar Plains Rd Sandy Hook, VA 23153 for the amount of \$238,000 to Kevin and Emily Brooks. The sale proceeds will be sufficient to satisfy via short sale the first lien of record on this property with the approximate amount of \$225,726.74; to satisfy via short sale the second lien of record on this property with the approximate amount of \$3,000.00; all associated closing costs, including but not limited to prorated real estate taxes and utilities, approximately \$8,773.26; and to pay Richard James Oulton, debtor's attorney, a reasonable and necessary attorney fee for services rendered in this matter not to exceed \$500.00. There will be no money remaining to pay to Robert Hyman, Chapter 13 Trustee. The Debtor will remain in her current bankruptcy and continue making regular monthly payments.

The Court further determining that it would be in the best interest of the creditors and parties in interest in this case to allow this sale to take place, and for these reasons and other good cause shown, it is hereby

ORDERED that the debtor is authorized to Sell real property, particularly described as

ALL that certain lot, piece or parcel of land, with improvements thereon and appurtenances thereuponto belonging, lying and being in the Lickinghole District of Goochland County, Virginia shown and designated as Lot 21 containing 4.12 acres more or less on that certain plat survey prepared by Michael L. Parrish & Associates, Inc., Professional Land Surveyors, entitled "Bolling Layne Place, Lickinghole District, Goochland County, Virginia", dated September 9, 1999, a copy of which plat is recorded in the Clerk's Office of the Circuit Court of Goochland County, Virginia in Plat Book 18, pages 153 through 160, reference to which plat is hereby made for a more particular description of the land hereby conveyed.

better known as:

3445 Cedar Plains Rd Sandy Hook, VA 23153

and it is

FURTHER ORDERED that prior to the actual closing of this transaction, the settlement agent shall forward to counsel for the debtor and the chapter 13 Trustee a proposed HUD-1 for review. It shall be the responsibility of counsel for the debtor to review these documents to assure that the terms of this Order and the payment of the proper amount to the Chapter 13 are provided for, and it is

FURTHER ORDERED that immediately after the closing the settlement agent shall provide a fully executed copy of the settlement statement and/or HUD-1 to counsel for the debtor and the Chapter 13 Trustee, and it is

FURTHER ORDERED that the Court hereby authorizes payment to debtor's attorney by the closing agent of reasonable and necessary attorney fees for services rendered in this matter not to exceed \$500 without further order of this Court. Any requested fees related to this transaction that exceed \$500 must be applied for and approved by the Court.

I ask for this:

/s/ Richard James Oulton
Richard James Oulton
Counsel for Debtor

Seen and approved:

Robert Hyman
Chapter 13 Trustee

Entered on Docket _____

U.S. Bankruptcy Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by electronic means or by mail first class a true accurate copy of the Corrected Proposed Order to Authorize Sell of Real Property to all creditors and to all necessary parties on 1/18/2013.

/s/ Richard J. Oulton

Richard J. Oulton, Attorney for Debtor

PARTIES TO RECEIVE COPIES:

Robert Hyman
Chapter 13 Trustee
P.O. Box 1780 Richmond, VA 23219-1780

JP Morgan Chase
700 Kansas Lane Monroe, LA 71203

Bank of Essex
323 Prince Street Tappahannock, VA 22560

Action Mortgage
11744 Parsons Walk Ct Glen Allen 23059

Jamie Ann-Irwin Oulton
2900 Greenway Ave Henrico, VA 23228